



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

F. #2017R02001

*271 Cadman Plaza East
Brooklyn, New York 11201*

September 5, 2019

By ECF and Email

Richard Willstatter, Esq.
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Brooklyn, New York 11201

Re: United States v. Tae Hung Kang and John Won
Criminal Docket No. 18-184 (RJD)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This disclosure supplements the government's earlier disclosures by letters dated April 17, 2018, May 9, 2018, June 5, 2018, August 6, 2018 and July 9, 2019. The government again requests reciprocal discovery from the defendants.

Enclosed herewith are copies of transcripts of depositions taken in the matter United States Commodities & Futures Trading Comm'n v. Safety Capital Mgmt. Inc., 15-CV-5551 (RJD). As you know, your clients are named as defendants in that matter.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney
Eastern District of New York

By: /s/
Lauren H. Elbert
Assistant U.S. Attorney
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cc: Clerk of the Court (RJD) (by ECF) (w/o enclosures)